

Exhibit C

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

~~~~~

MRI SOFTWARE, LLC,

Plaintiff,

vs.

Case No. 1:12-CV-01082-CAB

LYNX SYSTEMS, INC.,

Defendant.

~~~~~

Deposition of
DONALD ROBINSON
September 25, 2012
1:07 p.m.

Taken at:
Mazanec Raskin & Ryder
100 Franklin's Row
Cleveland, Ohio

Wendy L. Klauss, RPR

1 A. I'm not aware which versions it
2 would work with.

3 Q. All right. And can you just,
4 again, once again, describe what are the
5 specific functions of the thing that you built,
6 what does it work with?

7 A. In this specific integration?

8 Q. The thing that you have -- anything
9 that you have built for Avid Exchange in the
10 past year.

11 A. This is the only one I'm aware of,
12 and I was not involved in the writing of the
13 work order on this one, so I'm not specifically
14 familiar with the details of what was done on
15 this job.

16 Q. Do you have somewhere, say, within
17 your company, the work order for this work?

18 A. Yes.

19 Q. And what would that be called?

20 A. It would be a PSO.

21 Q. And what does PSO stand for?

22 A. Professional service order.

23 Q. And has there been just one PSO for
24 Avid Exchange?

25 A. I don't know.

1 Q. Okay. Now, these column headings,
2 at least the four of them are the same as the
3 column headings on the previous page. There is
4 another column heading entitled Description.
5 Who generates the descriptions that are shown
6 in that column?

7 A. Tracey did that based on the
8 download. So she was able to go through, and
9 if it was a support invoice, she put in support
10 under the description.

11 Q. So you looked at -- I'm sorry.
12 Tracey looked, she reviewed invoices, and then
13 determined the appropriate description to put
14 into this column?

15 A. Correct.

16 Q. And then PSO Number -- I'm sorry,
17 that stands for?

18 A. Professional service order.

19 Q. And why is it that next to some of
20 these items there is a PSO number and
21 description and others there is not?

22 A. If we are quoting on something,
23 then we give it a PSO number.

24 Q. And where are the PSOs maintained?

25 A. They will be on a server.

1 Q. So you keep a record of all of
2 those?

3 A. Yes.

4 Q. And so explain to me what would
5 cause you to generate a quote, how does this
6 process work?

7 A. Clients call us, tell us we need
8 this done, can you give us a quote. We will
9 write up a detailed response that says here is
10 what we are going to deliver and this is how
11 much. Please sign and approve the work.

12 Q. And other than signing and
13 approving the PSO, do you have written
14 agreements with your clients?

15 A. In some cases, we have a
16 professional services agreement.

17 Q. And what does that set forth?

18 A. Terms and conditions for us working
19 together on an ongoing basis.

20 Q. And do you keep all of those?

21 A. They are kept in a client file.

22 Q. How far back do those files go?

23 A. We usually have one file for
24 everyone from 2002, when we started selling the
25 MRI system.